

VIA ELECTRONIC FILING

July 23, 2023

The Honorable Gabriel W. Gorenstein

Daniel Patrick Moynihan

United States Courthouse

500 Pearl Street

New York, NY 10007

Re: Request for extension of discovery schedule

*Tyler Erdman v. Adam Victor, et al.*, No. 20 Civ. 4162

Dear Judge Gorenstein:

Plaintiff writes to request that the discovery deadline be extended from July 24th to September 7th, and the letter to Judge Schofield as required by paragraph 13.b of Docket #77 be extended from July 31 to September 14th. The Court has previously granted numerous extensions, the most recent being June 20, 2023, May 3, 2023, and April 3, 2023.

Plaintiff requests this extension as he has reviewed Defendant's latest document production and it does not appear to comply with the Court's orders that required a comprehensive search to the present day. The most obvious evidence of this being the latest privilege log listing emails only until 10/16/2018. Defendant has provided 21,150 privilege entries thus far, and not a single one or document produced mentions his current counsel. Defendant had told Plaintiff and the Court that he would be producing documents and log entries relating to communications with custodians, those also appear to be absent. Plaintiff has sent questions and requests to Defendant to address these issues. Defendant has stated that he will be conferring with his ediscovery vendor to help respond to them.

Mr. Rodriguez and Plaintiff spoke on July 19th for approximately 20 minutes. He has agreed to this request. The parties thank the Court for its attention to this matter.

Respectfully submitted,

/s/Tyler Erdman

Plaintiff Pro Se

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